

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

WELLPATH HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-90533 (ARP)
(Jointly Administered)

Related to Dkt. Nos. 21, 194,
384, 607

**NOTICE OF WITHDRAWAL OF THE UNITED STATES' OBJECTION
AND RESERVATION OF RIGHTS TO DEBTORS' NOTICE OF POTENTIAL
ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS OR UNEXPIRED
LEASES AND CURE AMOUNT AND SALE MOTION**

The United States of America (the “United States”), on behalf of the United States the Federal Bureau of Prisons (“FBOP”), the Federal Communications Commission (“FCC”), and the United States Department of Homeland Security, United States Immigration and Customs Enforcement (“ICE”), hereby withdraws its objection (“U.S. Objection”) [Docket No. 607] to the Debtors’ motion seeking an order authorizing the sale of Debtors’ assets and approving the assumption and assignment of certain federal executory contracts.

The United States’ concerns with *Debtors’ Emergency Motion for Entry Of Orders (I)(A) Approving the Bidding Procedures for the Sale of the Debtors’ Assets, (B) Approving Entry into a Stalking Horse Purchase Agreement for the Recovery Solutions Assets, (C) Authorizing the Recovery Solutions Expense Reimbursement, (D) Authorizing Potential Selection of Stalking*

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/Wellpath>. The Debtors’ service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

Horse Bidders for the Corrections Assets and Approving Related Corrections Asset(s) Bid Protections, (E) Establishing Related Dates and Deadlines, (F) Approving the Form and Manner of Notice thereof, and (G) Approving the Assumption and Assignment Procedures, (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances (B) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief ("Sale Motion") [Docket No. 21], and the United States' objections to Debtors' *Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount* ("Notice of Assumption and Assignment") [Docket No.194] have been resolved (as to the sale of Debtors' Recovery Assets²) with the agreed upon language in Paragraphs 52—55 of the Debtors' proposed sale order. See Exhibit A of *Notice of Filing of Proposed Sale Order Relating to the Recovery Solutions Assets Sale* [Docket No. 818]. By filing this withdrawal, however, the United States does not waive and expressly preserves any other rights, claims, actions, defenses, setoffs, or recoupments to which it entitled.

Dated: January 7, 2025

Respectfully submitted,

BRIAN M. BOYNTON
Deputy Assistant Attorney General

/s/ Cortney Robinson
KIRK MANHARDT
MARY SCHMERGEL
CORTNEY ROBINSON
Civil Division
U. S. Department of Justice
P. O. Box 875
Ben Franklin Station

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Sale Motion or Notice of Assumption and Assignment, as applicable.

Washington, D.C. 20044-0875
202-616-2265
cortney.robinson@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2025, a true and correct copy of the forgoing has been served upon all ECF participants in these cases electronically through the Court's ECF noticing system, at their respective email addresses registered with the Court.

Dated: January 7, 2024

/s/ Cortney Robinson
Cortney Robinson